

1 **JENNIFER L. COON**  
2 California State Bar No. 203913  
3 **FEDERAL DEFENDERS OF SAN DIEGO, INC.**  
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8 Attorneys for Mr. Heron-Salinas

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11 UNITED STATES DISTRICT COURT

12 SOUTHERN DISTRICT OF CALIFORNIA

13 (HONORABLE JEFFREY T. MILLER)

14 UNITED STATES OF AMERICA, ) CASE NO. 07CR2872-JM  
15 Plaintiff, ) DATE: January 25, 2008  
16 v. ) TIME: 11:30 a.m.  
17 JUAN HERON-SALINAS, ) NOTICE OF MOTIONS AND MOTIONS TO:  
18 Defendant. ) 1) DISMISS INDICTMENT DUE TO  
19 ) 2) GRANT LEAVE TO SUPPLEMENT  
20 ) MOTION AND TO FILE FURTHER  
21 ) MOTIONS  
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19 TO: KAREN P. HEWITT, UNITED STATES ATTORNEY; AND  
20 NICOLE A. JONES, ASSISTANT UNITED STATES ATTORNEY:

21 PLEASE TAKE NOTICE that, on January 25, 2008, at 11:00 a.m., or as soon thereafter as counsel  
22 may be heard, defendant, Juan Heron-Salinas, by and through his attorneys, Jennifer L. Coon and  
23 Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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## **MOTIONS**

Defendant Juan Heron-Salinas, by and through his attorneys, Jennifer L. Coon and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

- (1) Dismiss the Indictment Due to an Invalid Deportation; and
- (2) Grant Leave to Supplement Motion and to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

DATED: January 11, 2008

/s/ Jennifer L. Coon  
**JENNIFER L. COON**  
Federal Defenders of San Diego, Inc.  
Attorneys for Mr. Heron-Salinas